

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re	)	Chapter 15
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., <sup>1</sup>	)	Case No. 22-10630 (JTD)
Debtor in a Foreign Proceeding.	)	
In re:	)	Chapter 11
Credito Real, S.A.B. de C.V., SOFOM, E.N.R.	)	Involuntary Case No. 22-10696 (JTD)
Putative Debtor.	)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON SEPTEMBER 19, 2022 AT 11:00 A.M. (ET)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM  
AND REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE.  
COURTCALL WILL NOT BE USED TO DIAL IN.**

**PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:**

**[https://debuscourts.zoomgov.com/meeting/register/vJItcuioqzgrGf8B6\\_6mJqmXEKmATEYs30Y](https://debuscourts.zoomgov.com/meeting/register/vJItcuioqzgrGf8B6_6mJqmXEKmATEYs30Y)**

**ONCE REGISTERED, PARTIES WILL RECEIVE AN EMAIL CONTAINING  
PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

**I. STATUS CONFERENCE:**

1. Verified Petition for Recognition of Foreign Main Proceeding [[Chpt 15 Docket No. 2](#) – filed July 14, 2022]

Objection / Response Deadline: August 26, 2022 at 4:00 p.m. (ET)

<sup>1</sup> The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

Objections / Responses Received:

- A. Letter from Stanislav Bozhenko [[Chpt 15 Docket No. 41](#) – filed August 22, 2022]
- B. Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 44](#) – filed August 26, 2022]
- C. Declaration of Alejandro Sainz in Support of the Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 45](#) – filed August 26, 2022]
- D. Declaration of Jorge Villen in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 46](#) – filed August 26, 2022]
- E. Declaration of Luis Manuel Camp Meján Carrer [[Chpt 15 Docket No. 47](#) – filed August 26, 2022]
- F. Supplemental Declaration of Kenneth J. Monaghan on Behalf of Institutional Multiple Investment Fund LLC [[Chpt 15 Docket No. 48](#) – filed August 26, 2022]

Related Documents:

- i. Chapter 15 Petition for Recognition of Foreign Proceeding [[Chpt 15 Docket No. 1](#) – filed July 14, 2022]
- ii. Declaration of Juan Pablo Estrada Michel Pursuant to 28 U.S.C. § 1746 [[Chpt 15 Docket No. 3](#) – filed July 14, 2022]
- iii. Notice of Filing and Hearing on Petition Under Chapter 15 of the United States Bankruptcy Code and Motion for Related Relief [[Chpt 15 Docket No. 40](#) – filed August 12, 2022]
- iv. Statement Notifying the Court of Developments in the Mexican Liquidation Proceeding Pursuant to 11 U.S.C. § 1518 and 28 U.S.C. § 1746 [[Chpt 15 Docket No. 42](#) – filed August 25, 2022]
- v. Supplemental Declaration of Juan Pablo Estrada Michel [[Chpt 15 Docket No. 43](#) – filed August 25, 2022]

- vi. Statement Notifying the Court of the Developments in the Mexican Liquidation Proceeding Pursuant to 11 U.S.C. § 1518 and 28 U.S.C. § 1746 [[Chpt 15 Docket No. 53](#) – filed September 14, 2022]
- vii. Notice of Filing of a Certified Translation of the Moreno Appeal [[Chpt 15 Docket No. 54](#) – filed September 14, 2022]
- viii. Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 55](#); [Chpt 11 Docket No. 63](#) – filed September 14, 2022]
- ix. Third Declaration of Juan Pablo Estrada Michel Pursuant to Pursuant to 28 U.S.C. § 1746 [[Chpt 15 Docket No. 57](#); [Chpt 11 Docket No. 65](#) – filed September 14, 2022]
- x. Declaración de José Ramón Cossío Díaz Para Sustentar a La Petición Conforme al Capitulo 15 y La Solicitud Para Desestimar [[Chpt 15 Docket No. 58](#); [Chpt 11 Docket No. 66](#) – filed September 14, 2022]
- xi. Order Granting Motion for Leave to Exceed the Page Limitation with Respect to the Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 59](#); entered September 14, 2022]

Status: A status conference regarding this matter is going forward.

- 2. Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 5](#)– filed July 14, 2022]

Objection / Response Deadline: August 26, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 55](#) – filed August 26, 2022]
- B. Declaration of Alejandro Sainz in Support of the Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 56](#) – filed August 26, 2022]
- C. Declaration of Jorge Villen in Support of Objection of the Ad Hoc Group to the (I) Verified Petition for Recognition of Foreign Main Proceeding

and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 57](#) – filed August 26, 2022]

- D. Declaration of Luis Manuel Camp Meján Carrer [[Chpt 11 Docket No. 58](#) – filed August 26, 2022]
- E. Supplemental Declaration of Kenneth J. Monaghan on Behalf of Institutional Multiple Investment Fund LLC [[Chpt 11 Docket No. 59](#) – filed August 26, 2022]

Related Documents:

- i. Involuntary Petition Against a Non-Individual [[Chpt 11 Docket No. 1](#) – filed June 22, 2022]
- ii. Summons to Debtor in Involuntary Case [[Chpt 11 Docket No. 2](#) – filed June 23, 2022]
- iii. Declaration of Robert Wagstaff in Support of (I) Motion of the Putative Debtor to Transfer Venue of the Involuntary Chapter 11 Case to the United States Bankruptcy Court for the District of Delaware and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 7](#) – filed July 14, 2022]
- iv. Declaration of Juan Pablo Estrada Michael in Support of (I) Motion of the Putative Debtor to Transfer Venue of the Involuntary Chapter 11 Case to the United States Bankruptcy Court for the District of Delaware and (II) Motion of the Putative Debtor to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 8](#) – filed July 14, 2022]
- v. Notice of Motion and Hearing [[Chpt 11 Docket No. 51](#) – filed August 12, 2022]
- vi. Reply in Support of (I) Verified Petition for Recognition of Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 15 Docket No. 55](#); [Chpt 11 Docket No. 63](#) – filed September 14, 2022]
- vii. Third Declaration of Juan Pablo Estrada Michel Pursuant to Pursuant to 28 U.S.C. § 1746 [[Chpt 15 Docket No. 57](#); [Chpt 11 Docket No. 65](#) – filed September 14, 2022]
- viii. Declaración de José Ramón Cossío Díaz Para Sustentar a La Petición Conforme al Capítulo 15 y La Solicitud Para Desestimar [[Chpt 15 Docket No. 58](#); [Chpt 11 Docket No. 66](#) – filed September 14, 2022]
- ix. Order Granting Motion for Leave to Exceed the Page Limitation with Respect to the Reply in Support of (I) Verified Petition for Recognition of

Foreign Main Proceeding and (II) Motion to Dismiss the Involuntary Chapter 11 Petition [[Chpt 11 Docket No. 67](#) - entered September 15, 2022]

Status: A status conference regarding this matter is going forward.

Dated: September 15, 2022

Respectfully submitted,

/s/ Amanda R. Steele

**RICHARDS, LAYTON & FINGER, P.A.**

Mark D. Collins (No. 2981)  
John H. Knight (No. 3848)  
Paul N. Heath (No. 3704)  
Amanda R. Steele (No. 4430)  
920 North King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
collins@rlf.com  
knight@rlf.com  
heath@rlf.com  
steele@rlf.com

*Co-Counsel to the Foreign Representative  
and the Putative Debtor*

**WHITE & CASE LLP**

John K. Cunningham (admitted *pro hac vice*)  
J. Christopher Shore (admitted *pro hac vice*)  
Philip M. Abelson (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
jcunningham@whitecase.com  
cshore@whitecase.com  
philip.abelson@whitecase.com

Richard S. Kebrdle (admitted *pro hac vice*)  
Jason N. Zakia (admitted *pro hac vice*)  
Jesse Green (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
rkebrdle@whitecase.com  
jzakia@whitecase.com  
jgreen@whitecase.com

*Co-Counsel to the Foreign Representative and the  
Putative Debtor*